

Albert N. Kennedy, OSB No. 821429
Direct Dial: (503) 802-2013
Facsimile: (503) 972-3713
E-Mail: al.kennedy@tonkon.com

TONKON TORP LLP
1600 Pioneer Tower
888 S.W. Fifth Avenue
Portland, OR 97204

Attorneys for Defendant Steven Gerlicher

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
(Portland Division)

**WELLS FARGO BANK, NATIONAL
ASSOCIATION**, a National Banking
Association,

Plaintiff,

v.

**STEVEN GERLICHER and AARON
LAFKY**,

Defendants.

Civil No. 3:14-cv-02034

**STEVEN GERLICHER'S ANSWER TO
PLAINTIFF'S COMPLAINT**

To answer plaintiff's Complaint, defendant Steven Gerlicher ("Gerlicher") states:

1. Admitted.
2. Admitted.

3. The first sentence of paragraph 3 is admitted. Further admitted that the indebtedness of Muskie Properties, LLC and Northland Holdings, LLC is evidenced by a Promissory Note and that a copy of the Repayment Guaranty is attached to the Complaint as Exhibit 1. Except as admitted, the remaining allegations are denied.

4. Admitted that Muskie Properties, LLC and Northland Properties, LLC are in default pursuant to the terms of the Promissory Note in effect with plaintiff for failure to pay the amounts due thereunder as agreed. The remaining allegations contained in paragraph 4 are denied because Muskie Properties, LLC and Northland Properties, LLC are and will continue to make payments to plaintiff and Gerlicher is without knowledge or information sufficient to determine the truth thereof.

5. Admitted.

6. In response to the allegations set forth in paragraph 6, Gerlicher states that the Repayment Guaranty speaks for itself.

WHEREFORE, defendant Steven Gerlicher prays that this Court enter such judgment as it determines is just and equitable, with post-judgment interest, if any, at the rate provided in 28 U.S.C. § 1961.

DATED this 28th day of January, 2015.

TONKON TORP LLP

By /s/ Albert N. Kennedy

Albert N. Kennedy, OSB No. 821429

Direct Dial: (503) 802-2013

Fax: (503) 972.3713

E-Mail: al.kennedy@tonkon.com

Attorneys for Defendant Steven Gerlicher

036999/00001/6180579v1